

All redactions Ex. 4

AUG 28 2006

FILE

MEMORANDUM

SUBJECT: Brown Traffic Products, Inc.
AKA: Eagle Signal Controls
AKA: The Sign Shop
AKA: Danaher Controls
Davenport, Iowa
EPA RCRA ID# No. IAD051001337

FROM: Cynthia Hutchison
ENSV/EAMB

Bob Aston
ARTD/RCAP

THRU: Howard Bunch
CNSL

TO: Lynn M. Slugantz, Chief
ARTD/RCAP Branch

RCRA



This memorandum documents the determination that corrective action is complete at Brown Traffic Products, of Davenport, Iowa. The memo also recommends a recording of a CA999 (corrective action complete) in the RCRA Info database for Brown Traffic Products. Brown received a National Corrective Action Priority (NCAP) ranking of low on January 7, 1993.

Site History: This facility obtained interim status as Eagle Signal by submitting a Part A hazardous waste permit application on November 14, 1980. On September 22, 1982, they requested a change in status to become a less than 90-day storage facility. They completed closure with the Iowa Department of Water, Air and Waste Management (IDWAWM) and RCRA on August 27, 1984. The closure and termination of interim status was approved by IDWAWM on September 26, 1984.

EPA's intent to deny the permit and the public notice of closure were published on March 11, 1986. Closure was verified and approved by EPA on April 28, 1987. The Comprehensive

F:\Workfiles\Hutchison\2006\Brown memo for CA999.doc:dmathis:7/26/06

ENSV/DISO
Hutchison

CH
7/26/06

ENSV/DISO
Robichaud

[Signature]
7/26/06

ARTD/RCAP
Aston

RE
8/14/06

CNSL
Bunch

113
8/23/06

Permitting database describes receipt of a Part B hazardous waste permit application and loss of interim status (LOIS) due to failure to submit the Part B application on the same day, November 8, 1988. The facility is described as "clean closed" as of February 28, 1985, for their container storage area.

A RCRA Facility Assessment (RFA) equivalent environmental priorities initiative preliminary assessment (EPI/PA) and a visual site inspection (VSI) were conducted by EPA contractor, Camp, Dresser & McKee (CDM) during May 1992. It identified 14 solid waste management units (SWMUs) and two areas of concern (AOC). All SWMUs were located inside the building. AOC #1 was located on a blacktop parking lot surface. AOC #2 was located inside a building. No history or evidence of releases at these areas was documented. No recommendations for further investigation or remediation were made in the EPI/PA or VSI.

An inspection was conducted by EPA contractors on July 10, 1995. The inspectors found that Eagle Signal had vacated the premises in February 1994. They took all of the equipment and cleaned the space before leaving. The floor was sandblasted and a new floor was poured over the old floor. Eagle Signal had 3-1/2 years left on its lease when they left. The new leaseholder, The Sign Shop, manufactured vinyl signs and did not generate hazardous waste. An Iowa screening inspection was conducted in 1998 which documented a change of regulatory status to "non-handler" of hazardous waste for this facility.

There is a January 28, 2003 letter in the file from Bill Lowe, EPA geologist, to Schiltz Properties, Inc., owner of the site, stating: "Based on my review and the currently available information, there does not appear to be any additional investigations or corrective actions required at this time."

Recommendation: This facility gained interim status in 1980 by submitting a Part A permit application. They were released from interim status on September 26, 1984 by the state of Iowa and experienced a federal loss of interim status (LOIS) reflected in EPA's database on November 8, 1988. Their units were RCRA closed by Iowa Department of Natural Resources (IDNR) and by EPA. The closures were public noticed. An RFA did not discover need for any additional investigation or remediation. The facility has changed hands several times and is currently occupied by a non handler. No further public notification is necessary since there is no permit to deny. I recommend placement of a CA999 data code in RCRA Info, signifying corrective action complete.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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This memorandum documents the determination that corrective action is complete at Brown Traffic Products, of Davenport, Iowa. The memo also recommends a recording of a CA999 (corrective action complete) in the RCRA Info database for Brown Traffic Products. Brown received a National Corrective Action Priority (NCAP) ranking of low on January 7, 1993.

Site History: This facility obtained interim status as Eagle Signal by submitting a Part A hazardous waste permit application on November 14, 1980. On September 22, 1982, they requested a change in status to become a less than 90-day storage facility. They completed closure with the Iowa Department of Water, Air and Waste Management (IDWAWM) and RCRA on August 27, 1984. The closure and termination of interim status was approved by IDWAWM on September 26, 1984.

EPA's intent to deny the permit and the public notice of closure were published on March 11, 1986. Closure was verified and approved by EPA on April 28, 1987. The Comprehensive

Permitting database describes receipt of a Part B hazardous waste permit application and loss of interim status (LOIS) due to failure to submit the Part B application on the same day, November 8, 1988. The facility is described as "clean closed" as of February 28, 1985, for their container storage area.

A RCRA Facility Assessment (RFA) equivalent environmental priorities initiative preliminary assessment (EPI/PA) and a visual site inspection (VSI) were conducted by EPA contractor, Camp, Dresser & McKee (CDM) during May 1992. It identified 14 solid waste management units (SWMUs) and two areas of concern (AOC). All SWMUs were located inside the building. AOC #1 was located on a blacktop parking lot surface. AOC #2 was located inside a building. No history or evidence of releases at these areas was documented. No recommendations for further investigation or remediation were made in the EPI/PA or VSI.

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Recommendation: This facility gained interim status in 1980 by submitting a Part A permit application. They were released from interim status on September 26, 1984 by the state of Iowa and experienced a federal loss of interim status (LOIS) reflected in EPA's database on November 8, 1988. Their units were RCRA closed by Iowa Department of Natural Resources (IDNR) and by EPA. The closures were public noticed. An RFA did not discover need for any additional investigation or remediation. The facility has changed hands several times and is currently occupied by a non handler. No further public notification is necessary since there is no permit to deny. I recommend placement of a CA999 data code in RCRA Info, signifying corrective action complete.


 United States
Environmental Protection
Agency
Form Completed on: 7/27/06Form Completed by: Cynthia Hutchison

HANDLER INFORMATION

 RCRA ID #: IA051001337 Handler Name: Brown Traffic Products

EVENT INFORMATION

Event Description: Corrective Action Process Terminated
 Event Code: CA999 Status Code: NF Scheduled Date: / / Actual Date: 7/27/06
Agency: Staff Person:

Notes:

Event Description:

 Event Code: Status Code: Scheduled Date: / / Actual Date: / /
Agency: Staff Person:

Notes:

AREA INFORMATION

Area Name: Staff Person:
 Entire Facility? ☐ Yes ☐ No Release Indicator (check all that apply): ☐ Air ☐ Groundwater ☐ Soil ☐ Surface Water

Notes:

Area Name:

Staff Person:
 Entire Facility? ☒ Yes ☐ No Release Indicator (check all that apply): ☐ Air ☐ Groundwater ☐ Soil ☐ Surface Water

Notes:

AUTHORITY INFORMATION

Authority Type: Authority Type Description:

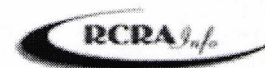
Authority Type: A=Consent Order, C=Consent Decree, D=Judicial Decree, I=Interim Status, J=Judicial Order, M=Permit Modification, N=Order Modification, O=Operating Permit, P=Post-Closure Permit, S=State Analogous, U=Unilateral Order, V=Voluntary CA, X=Agency Policy/Procedure, Z=Other

Effective Date: / / Issued Date: / / Agency: Revocation Date: / / Staff Person: Statutory Citation:

Statutory Citation: A=RCRA 3004(u), B=RCRA 3004(v), C=RCRA 3008(a), D=RCRA 3008(h), E=RCRA 3013, F=RCRA 7003, G=CERCLA 104, H=CERCLA 106, U=Other (specify)



Corrective Action Event List



BROWN TRAFFIC PRODUCTS INC

DAVENPORT

IAD051001337

Select the event to process or choose the Add New Event button below:

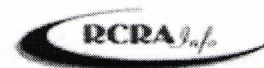
Your search has found 4 event(s).

Seq.	Act Loc	Owner/Event Code Description	Sched Date Orig	Actual Date	Agcy	Linked Authority	Linked Areas
1	IA	US - CA050PA - RFA COMPLETED-ASSESSMENT WAS A PA-PLUS		1/27/1993	E	X - Agency Policy/Procedure	ENTIRE FACILITY
1	IA	HQ - CA070YE - DETERMINATION OF NEED FOR A RFI-RFI IS NECESSARY		1/27/1993	E	X - Agency Policy/Procedure	ENTIRE FACILITY
2	IA	HQ - CA075LO - CA PRIORITIZATION-LOW CA PRIORITY		1/7/1993	E	X - Agency Policy/Procedure	ENTIRE FACILITY
1	IA	HQ - CA075ME - CA PRIORITIZATION-MEDIUM CA PRIORITY		1/28/1992	E	X - Agency Policy/Procedure	ENTIRE FACILITY

URL: /CorrectAct/CA_event_main.asp



Update Series/Event



BROWN TRAFFIC PRODUCTS INC

DAVENPORT

IAD051001337

Last Updated By: HQLSF

Last Updated
On: 9/16/2000 4:35:24
PM

The following series is available for updating: Seq. No: 500 Series Name: CLOSURE

EPA Person: R7KVH - KENNETH HERSTOWSKI

State Person: R7 - _ _ _

EPA Attorney: R7 - _ _ _

State Attorney: R7 - _ _ _

Series
Notes:

Cancel

Select the Event to process:

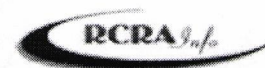
Activity Location	Event Seq#	Code Owner	Event Code	Orig Scheduled Date	New Scheduled Date	Actual Date	Resp Agency	Event Code Desc
IA	1	HQ	OP01505			11/8/1992	E	LOSS OF INTERIM STATUS (LOIS)-FAILURE TO SUBMIT PART B
IA	1	US	OP020	11/8/1988	11/8/1988		E	PART B RECEIVED
IA	1	HQ	CL360ME			4/28/1987	E	PLAN APPROVED - CLOSURE-FINAL CLOSURE
IA	1	HQ	CL380CA			4/28/1987	E	CLOSURE VERIFICATION
IA	1	HQ	OP160ID			3/11/1986	E	PUBLIC NOTICE-INTENT TO DENY
IA	1	US	CL340			3/11/1986	E	PUBLIC NOTICE - CLOSURE
IA	1	US	OP180LN			8/27/1984	E	RECEIVED WITHDRAWAL REQUEST-APPLIC. HAS/WILL GO It 90 DAYS STORAGE
IA	1	HQ	CL310			7/27/1984	E	PLAN RECEIVED - CLOSURE
IA	1	HQ	CL370YE			7/17/1984	E	RECEIVE CLOSURE CERTIFICATION-ACCORDING TO PLAN
IA	1	HQ	OP002AK			12/16/1980	E	PART A DETERMINATION-ACKNOWLEDGEMENT OF PART A RECEIPT
IA	1	HQ	OP001IS			11/14/1980	E	PART A RECEIVED-INITIAL SUBMITTAL

Cancel

URL: PMT_series_upd.asp



Update Event



BROWN TRAFFIC PRODUCTS INC

DAVENPORT

IAD051001337

Last Updated By: HQLFS

Last Updated
On: 9/14/2000 8:44:31
AM

Location of Activity: IA

Event Seq: 1

This is the event you chose to update:

US - CA050PA - RFA COMPLETED-ASSESSMENT WAS A PA-PLUSOrig.
Scheduled
Date:New
Scheduled
Date:
(MM/DD/YYYY)

Resp. Agency: E

Actual
Date:1/27/1993
(MM/DD/YYYY)

Resp. Person: R7KVH - KENNETH HERSTOWSKI

Suborganization: 07 - IRS

Event
Notes:

Select one or more Authorities to Link to:

	Act Loc	Authority Owner	Authority Type	Effective Date	Resp Agency	Authority Desc	Statutory Citation
<input checked="" type="checkbox"/>	IA	HQ	X	7/1/2000	E	Agency Policy/Procedure	U - Other, specified by Legal Authority Citation

Select one or more Area(s) to Link to:

<input checked="" type="checkbox"/>	1 - ENTIRE FACILITY
-------------------------------------	---------------------

Cancel

URL: /CorrectAct/CA_event_upd.asp

